

At ____ of the United States District Court for the Southern District of New York, at the Courthouse thereof, located 40 Foley Square, New York, New York 10007 at on the __ day of _____ 2025

PRESENT: HON.

United States District Judge

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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DONGGUAN CHENG ONE CO., LTD.,

CIVIL ACTION NO.

Plaintiff,

1:24-cv-03388

-against-

ORDER TO SHOW
CAUSE

DESEN INC.,

Defendant.

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Upon reading and filing the annexed affirmation of Aleksander B. Milch, Esq., affirmed on the 12th day of May 2025, the declaration of Yangyang Wu, dated the 11th day of May 2025, the declaration of Fei Xu dated the 11th day of May 2025, the memorandum of law attached hereto, and upon the exhibits attached to the affirmation and declarations, and upon the summons and complaint, upon which the instant action was commenced, the affidavit of service of the summons and complaint on the defendant, and all the papers and proceedings heretofore had herein;

LET THE PLAINTIFF, DONGGUAN CHENG ONE CO., LTD., or its attorneys, show cause before this Court, before the **HONORABLE EDGARDO RAMOS**, at the courthouse located at **40 FOLEY SQUARE, COURTROOM 619, NEW YORK, NEW YORK 10007** on the ____ day of _____, 2025, at 9:30 A.M. in the forenoon of that day, or as soon thereafter as counsel can be heard, why an order should not be made and entered granting the following relief:

- (a) Pursuant to **FRCP 60(b)** vacating the **ORDER AND JUDGMENT** dated **JANUARY 22, 2025** entered in favor of the plaintiff and against the defendant;
- (b) Reinstating the proceedings in this case;
- (c) Accepting the defendant's proposed answer; **and**
- (d) Granting such other and further relief, as this Court deems to be just, equitable, and proper.

PENDING THE HEARING OF THIS MOTION IT IS:

ORDERED that enforcement of the **ORDER AND JUDGMENT** dated **JANUARY 22, 2025** entered in favor of the plaintiff and against the defendant be **STAYED** and any additional enforcement efforts be **DISCONTINUED**, and directing that any monies collected thus far pursuant to the enforcement of said judgment be recovered and held in escrow pending a determination of this motion; and

SUFFICIENT CAUSE APPEARING THEREFORE, let service of a copy of this **ORDER TO SHOW CAUSE** with the supporting papers thereto be made upon the plaintiff's counsel, **MAZZOLA LINDSTROM, LLP, 1350 AVENUE OF THE AMERICAS, 2ND FLOOR, NEW YORK, NEW YORK 10018**, by U.S. Postal Service Priority Mail on or before _____ **2025**, which shall be deemed good and sufficient service thereof; and

ORDERED that opposition papers, if any, shall be filed with the Court and served upon **THE KASEN AND LIU LAW FIRM, PLLC, 136-33 37TH AVENUE, #9C, FLUSHING, NEW YORK 11354**, by U.S. Postal Service Priority Mail on or before _____ **2025**; and it is further,

ORDERED that reply papers, if any, shall be filed with the Court and served upon the plaintiff's counsel, **MAZZOLA LINDSTROM, LLP, 1350 AVENUE OF THE AMERICAS,**

2ND FLOOR, NEW YORK, NEW YORK 10018,, by U.S. Postal Service Express mail on or before _____ **2025.**

An affidavit or other proof of service shall be presented to this Court on the return date directed in this Order.

Dated: _____, 2025
New York, New York

E N T E R ,

HON. _____